

**Ari B. Teman**

Aug 16, 2023

The Honorable Andrew Lamar Carter Jr.  
District Judge,  
Southern District of New York

**Re: Unopposed motion for permission to serve targeted, limited subpoenas**

Your Honor,

On August 8, 2023, Your Honor instructed the Plaintiff to provide a list of individuals and entities whom the plaintiff would like to subpoena with permission of the Court. That list involves accounts known to have stalked and impersonated Mr. Teman, and fake accounts (meaning, real accounts but using fake identities) which have messaged others about Mr. Teman using false names.

To identify these users, Plaintiff would like permission to subpoena the following organizations, providing them a list of usernames, and a date range where these accounts have repeatedly impersonated or stalked Teman. As mentioned to Your Honor at the conference, the content requested will be limited to items which can identify the individuals, with the hope that once the individual or group is identified, a restraining order or other similar relief can be issued stopping them from impersonating the plaintiff to: The White House, law enforcement agencies, law firms, and individuals.

The organizations Plaintiff wishes to subpoena, as mentioned to Your Honor, are:

Meta, Twitter (now "X"), OpenWeb, and Google.

As explained on the conference call, it was on these platforms (Instagram, Twitter, and using what appear to be "burner" Gmail and "OpenWeb" accounts) that individuals would have seen that Plaintiff would be sedated in the hospital on the date the individuals then impersonated Mr. Teman to the aforementioned agencies and individuals, and it was on these platforms that the impersonators did message and stalk.

Specific individuals who have admitted to possessing communications about Mr. Teman which fall in-line with the characteristics of the impersonation are:

Ezra Stark(whose attorneys admit he possesses such messages as sought), Avi Goldenberg, Samuel Taub, Yanky Litchfield, Jonathan Samet, Ryan Thomas Hopkins, Christopher Belelieu, Margaret Crimmins, Shelly Jenkins-Pecot, Jackie Monzon, and Bryan Price.

As well, a list of fake accounts on instagram and twitter which have the characteristics of having no posts or real activity, which regularly follow, stalk, and at times message Teman. These accounts are “fake” in the sense they have 0 (or nearly 0) followers, posts, or friends and appear to be solely created to stalk and monitor Teman -- which would have enabled them to time their impersonations to the White House and federal agencies, as explained.

The subpoenas will be limited to: IP addresses at or around the time of the alleged incidents, GPS coordinates at those times, both of which will match the individuals to the impersonating accounts and the IP addresses provided by Granicus. As well, any messages or documents specifically mentioning or discussing: the Plaintiff, litigation or cases the plaintiff is involved in, or the plaintiff’s entities or relevant individuals tied to the plaintiff or entities.

The Plaintiff will agree in advance to keep any confidential information confidential, and to file any requests to unseal such information with the court.

Defendants Granicus and T-Mobile do not oppose this motion.

s/Ari Teman/  
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